

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
FLORENCE DIVISION**

Corey Price and Robert Price, as Personal  
Representative of the Estate of Brenda  
Mickens,

Plaintiffs,

vs.

Jim Korey Chambley and Darling  
Ingredients and/or Denali Water Solutions,  
LLC Jointly and Severally,

Defendants.

Civil Action No. \_\_\_\_\_

**NOTICE OF REMOVAL**

Defendants Denali Water Solutions, LLC (“Denali”) and Jim Korey Chambley (“Chambley”), through their counsel, file this Notice of Removal of the above-captioned action from the Darlington County Court of Common Pleas to the United States District Court for the District of South Carolina, Florence Division pursuant to 28 U.S.C. §§ 1332, 1441, and 1446. In support of this Notice of Removal, Defendants state as follows:

1. The above-entitled action was brought by Plaintiffs in the Darlington County Court of Common Pleas to recover a judgment for actual and punitive damages relating to a motor vehicle accident occurring in Darlington County, South Carolina on August 15, 2018.

2. This action was commenced against Denali by service of the Summons and Complaint on Defendant’s registered agent on January 18, 2019.

3. This action was commenced against Defendant Chambley by the service of a Summons and Complaint on the South Carolina Department of Motor Vehicles under the nonresident motorist statute on January 30, 2019.

4. This Notice of Removal is timely filed pursuant to 28 U.S.C. § 1441 *et. seq.* within thirty (30) days of the date of service on the properly joined Defendants.

5. Plaintiff Corey Price alleges he is a citizen and resident of North Carolina. Plaintiff Robert Price alleges he is a citizen and resident of South Carolina.

6. Denali is incorporated in the state of Delaware and has a principal place of business in Arkansas.

7. Defendant Chambley is a citizen and resident of Perry, Georgia.

8. Defendant Darling Ingredients, Inc. is a foreign corporation organized in Delaware with a principal place of business in Kentucky.

9. The August 15, 2018, motor vehicle accident resulted in the death of Brenda Mickens. Plaintiffs have asserted a survival action as well as a wrongful death claim.

10. This is a civil action over which this Court has original jurisdiction pursuant to 28 U.S.C. § 1332, because complete diversity exists between Plaintiffs and Defendants and because Plaintiffs have asserted claims and seek damages that create an amount in controversy exceeding Seventy-Five Thousand and No/100 (\$75,000.00) Dollars, exclusive of interest and costs.

11. Defendants file herewith copies of all process, pleadings and orders served upon it in this action as part of this Notice as Exhibit A.

12. Defendants are serving counsel for Plaintiffs and counsel for co-Defendant Darling Ingredients, Inc. with written notice of the removal of this action and will provide a copy of the Notice of Removal to the Clerk of Court for Darlington County, South Carolina as required by 28 U.S.C. § 1446(d).

13. Darling Ingredients, Inc. consents to removal.

WHEREFORE, Defendants Denali Water Solutions, LLC and Jim Korey Chambley pray that this Honorable Court accept this Notice of Removal and take jurisdiction of Civil Action No. 2019-CP-16-00003 and that all further proceedings in the Circuit Court be stayed.

Respectfully submitted,

COLLINS & LACY, P.C.

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ATTORNEYS FOR DEFENDANTS  
DENALI WATER SOLUTIONS, LLC  
AND JIM KOREY CHAMBLEY

Murrells Inlet, South Carolina  
February 19, 2019

**CERTIFICATE OF FILING**

This is to certify that a true and correct copy of the foregoing is being electronically transmitted to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrant:

**COUNSEL SERVED:**

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*Counsel for Defendant Darling Ingredients*

**PLEADING:**

- **NOTICE OF REMOVAL**

s/William A. Bryan, Jr.

Murrells Inlet, South Carolina  
February 19, 2019